

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF MISSISSIPPI**

IN RE: SUSAN PARKER-GRAHAM DBA
INDEPENDENT IMAGING SERVICES, LLC FDBA
EVOLVE MEDICAL SOLUTIONS, LLC AKA
SUSAN C. PARKER AKA SUSAN C. WATTS,
DEBTOR

CHAPTER 13 PROCEEDING

CASE NO. 18-12789-JDW

OBJECTION TO PROPOSED CHAPTER 13 PLAN AND CONFIRMATION THEREOF

COMES NOW, Federal National Mortgage Association ("Fannie Mae") c/o Seterus, Inc., a secured creditor under 11 U.S.C. § 506 (a) & (b), in the above entitled Bankruptcy proceeding, by and through its attorney, and hereby submits the following objections to the confirmation of the Chapter 13 Plan submitted by Debtor, and in support of said objection states as follows:

I.

That this objecting secured creditor holds that certain Deed of Trust Note with an original Principal Balance of \$172,073.00 executed by the Debtor on August 16, 2010, and secured by that Deed of Trust on the residence of the Debtor, filed of record in the Office of the Chancery Clerk of Lee County, Mississippi in Instrument No. 2010010952, and generally described as:

The following described located in Lee County, Mississippi, to-wit:

Lot No. 3 of Sunny Meadows Subdivision:

Commencing on an iron pin (found) at the Northeast Corner of Section 27, Township 9 South, Range 7 East; thence North 89 degrees 59 minutes 48 seconds West for a distance of 793.46 feet; thence South for a distance of 530.37 feet to an iron pin (set) for a Point of Beginning; thence continue South for a distance of 175.00 feet to an iron pin (set); thence West for a distance of 581.77 feet to an iron pin (set); thence North 17 degrees 26 minutes 21 seconds East for a distance of 183.43 feet to an iron pin (set); thence East for a distance of 526.80 feet to the Point of Beginning. All lying and being in the Northeast Quarter of Section 27, Township 9 South, Range 7 East, Lee County, Mississippi and containing 2.23 acres, more or less.

Included with and Subject to a 30 feet ingress and egress Easement along the West side of the above described property for roadway purposes and described as follows: Beginning at the Southwest Corner of the above described property; thence North 17 degrees 26 minutes 21 seconds East for a distance of 708.42 feet to an iron pin (set) on the South line of Lee County

Road No. 1400; thence South 81 degrees 48 minutes 01 seconds East along the South line of said road for a distance of 30.39 feet; thence South 17 degrees 26 minutes 21 seconds West for a distance of 703.88 feet; thence West for a distance of 31.45 feet to the Point of Beginning. All lying and being in the Northeast Quarter of Section 27, Township 9 South, Range 7 East, Lee County, Mississippi.

The improvements thereon being known as 122 Pinetree Drive, Mooreville, MS 38857.

Subject to Restrictive Covenants as recorded in Instrument No. 0321609 in the Office of the Chancery Clerk, Lee County, Mississippi.

II.

That Debtor's proposed plan, docket number 8, provides for payment of the Debtor's prepetition arrearage to Federal National Mortgage Association ("Fannie Mae") c/o Seterus, Inc. through August 31, 2018 in the amount of \$7,818.75. Upon information and belief, there is an approximate amount of Prepetition arrearage owed to Federal National Mortgage Association ("Fannie Mae") c/o Seterus, Inc. in the amount of \$9,899.30.

III.

Federal National Mortgage Association ("Fannie Mae") c/o Seterus, Inc. objects to its proposed treatment under the plan in that it is a fully secured creditor upon the residence of the Debtor and its claim is not afforded the protection of 11 U.S.C. § 1322(b)(2).

WHEREFORE, Federal National Mortgage Association ("Fannie Mae") c/o Seterus, Inc. respectfully requests that confirmation of the Chapter 13 plan as submitted by the Debtor be denied.

Respectfully submitted
SHAPIRO & MASSEY, LLC

/s/ J. Gary Massey
J. Gary Massey
Attorney for Creditor

CERTIFICATE OF SERVICE

I, J. Gary Massey, of the firm of Shapiro & Massey, LLC, do hereby certify that I have this date provided a copy of the foregoing Objection either by electronic case filing or by United States mail postage pre-paid to the following:

Terre M. Vardaman, Chapter 13 Trustee,
vardaman13ecf@gmail.com

Dalton Middleton, Middleton Law Office, PLLC, Attorney for the Debtor
dm@MLawMS.com

Office of the U.S. Trustee
USTPRegion05.AB.ECF@usdoj.gov

Susan Parker-Graham dba Independent Imaging Services, LLC fdba Evolve Medical Solutions,
LLC aka Susan C. Parker aka Susan C. Watts
122 Pinetree Drive
Mooreville, MS 38857

Dated: August 31, 2018

Respectfully submitted
SHAPIRO & MASSEY, LLC

/s/ J. Gary Massey
J. Gary Massey
Attorney for Creditor

Presented by:
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